# SITE-SPECIFIC FIELD SAMPLING PLAN WILLOW STREET/HAWTHORNE AVENUE STATION OPERABLE UNIT

# **Prepared For:**

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Appendix B: Field Forms\*

Appendix C: LIF Field Operating Procedures\*

<sup>\* -</sup> See Multi-Site FSP, Rev 4, September 8, 2008

# **ACRONYMS**

Acronyms used in the Multi-Site Field Sampling Plan.

 $\begin{array}{ll} ^{\circ}C & Degrees\ Celsius \\ ^{\circ}F & Degrees\ Fahrenheit \\ \mu m & Micrometer\ /\ Micron \end{array}$ 

umhos/cm Micromhos Per Centimeter

AOC Administrative Order on Consent

ASTM International (fka American Society for Testing and Materials)

AVS SEM Acid Volatile Sulfides-Simultaneously Extracted Metals

BERA Baseline Ecological Risk Assessment

bgs Below Ground Surface

BTEX Benzene, Toluene, Ethylbenzene, and Xylenes

CA Cost Analysis cm Centimeter

COC Chain-of-Custody

COPC Constituents of Potential Concern
CPT Cone Penetrometer Technology

CSM Conceptual Site Model

DET Diffusion Equilibration in Thin Films
DNAPL Dense Non-Aqueous Phase Liquid

DQO Data Quality Objective
DPT Direct Push Technologies
EE Engineering Evaluation

ESB Equilibrium Partitioning Sediment Benchmark

eV Electron Volt
EZ Exclusion Zone

FAM Field Analytical Method

FEMA Federal Emergency Management Agency

FOP Field Operating Procedures

FSP Field Sampling Plan
GPS Global Positioning System

GW/SW Groundwater / Surface Water Interface

HSA Hollow Stem Augers

HAZWOPER Hazardous Waste Operations and Emergency Response

HASP Health and Safety Plan
HDPE High-Density Polyethylene

# **ACRONYMS** (CONT'D)

ID Inside Diameter

IDW Investigative Derived Wastes

Illinois EPA Illinois Environmental Protection Agency
ITRC Interstate Technology and Regulatory Council

LDPE Low-Density Polyethylene
LIF Laser Induced Fluorescence

LNAPL Light Non-Aqueous Phase Liquid

m Meter

MGP Manufactured Gas Plant mg/L Milligrams per Liter

MIP Membrane Interface Probe

mL Milliliter

mL/min Milliliters Per Minute

MS/MSD Matrix Spike/Matrix Spike Duplicate

mV Millivolts

NAPL Non-Aqueous Phase Liquid

NAVD88 North American Vertical Datum of 1988

NTU Nephelometric Turbidity Unit

OD Outside Diameter

ORP Oxidation / Reduction Potential

OSHA Occupational Safety and Health Administration
OSWER Office of Solid Waste and Emergency Response

PAHs Polynuclear aromatic hydrocarbons

PCB Polychlorinated Biphenyl
PDB Polyethylene Diffusion Bag
PID Photoionization Detector

POTW Publicly-Owned Treatment Works
PPE Personal Protective Equipment

ppm Parts Per Million

PQLs Project Quantitation Limits

PVC Polyvinyl Chloride PVD Passive-Vapor-Diffusion

PVOC Petroleum Volatile Organic Compound

QA Quality Assurance

QA/QC Quality Assurance/Quality Control

QAM Quality Assurance Manual
QAPP Quality Assurance Project Plan

# **ACRONYMS** (CONT'D)

QC Quality Control

RAF Risk Assessment Framework
RBP Rapid Bioassessment Protocols

RI/FS Remedial Investigations and Feasibility Studies

ROST Rapid Optical Screening Tool

Settlement Agreement and Administrative Order on Consent

SI Site Investigation

SIM Selected Ion Monitoring

SLERA Screening Level Ecological Risk Assessment

SOP Standard Operating Procedure

SSA Solid Stem Auger
SOW Statement of Work
SPE Solid-Phase Extraction
SPP Systematic Planning Process

SSWP Site-Specific Work Plan

TarGOST Tar-specific Green Optical Screening Tool

TOC Total Organic Carbon

USCS United Soil Classification System
USDOE United States Department of Energy
USGS United States Geological Survey

USEPA United States Environmental Protection Agency

UVOST Ultra-Violet Optical Screening Tool

VOA Volatile Organic Analyte
VOC Volatile Organic Compounds

# 1 INTRODUCTION

# 1.1 Background

This Site-Specific Field Sampling Plan (FSP) was prepared in accordance with the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (AOC) between the United States Environmental Protection Agency (USEPA) and The Peoples Gas Light and Coke Company (Peoples Gas), CERCLA Docket No. V-W-'08-C-917, effective October 31, 2008. The AOC/SOW addresses four former Manufactured Gas Plant (MGP) Sites operated by Peoples Gas and specifies that Remedial Investigations and Feasibility Studies (RI/FSs) be conducted on these Sites. The North Branch Site includes the Willow Street/Hawthorne Avenue Station Operable Unit (OU), the North Station OU and the Division Street Station OU. Each of the three OUs includes the portion of the North Branch of the Chicago River (the River) that is adjacent to the respective upland portion of the OU.

This Site-Specific FSP addresses the Willow Street/Hawthorne Avenue Station OU of the North Branch Site. The Division Street Station OU includes the land and the adjacent river area (ARA).

Integrys Business Support, LLC (IBS) is managing the work in the AOC/SOW on behalf of Peoples Gas. Unless specifically noted, the relevant sections of the Multi-Site FSP Rev 4, dated September 8, 2008 will be used while implementing the Site-Specific Work Plan (SSWP) at the Division Street Station OU. This Site-Specific FSP references the Multi-Site FSP sections that do not require Site-Specific elements.

# 1.2 Sampling Objectives

# 1.3 Site-Specific Work Plans

# 1.3.1 Technical Approach

The approach to determine sample locations, types, frequencies, collection methods and field analysis is discussed in Sections 4 and 6 of the SSWP and is also presented in Tables 1, 2 and 3 of the SSWP. Section 6 and of the SSWP and Tables 1, 2 and 3 also detail the decision process and site knowledge that will be utilized on a real-time basis to determine sample type, location, frequency, and constituents. Figures 9, 10 and 11 of the SSWP depict the proposed sampling locations on the land, within the ARA and in the River upstream of the North Branch Site, respectively. Maps depicting previously sampled media and locations are presented in the SSWP and in other referenced documents. Figure 11 will also be relevant to the other two OUs within the North Branch Site.

# 1.3.1.1 Soil Sampling

In the case of soil, borings will be continuously sampled and a sample will be selected for chemical analyses based on the presence of impacts identified by PID readings, odors or visual observation. If no impacts are encountered and recovery is sufficient, a sample will be selected for analyses based on a random sample scheme developed for the OU, splitting up the sample depth into 1 foot increments.

Borings will generally be advanced a minimum of 15 feet below ground surface (bgs). Borings that are at least 15 feet deep and are advanced a minimum of 4 feet into native silty clay or clay can be terminated, unless additional advancement is necessary for delineation purposes. For example, if impacts were encountered inward at a depth of 30 feet bgs and a step out boring is advanced to confirm lateral extent, the step out boring must be advanced at least 30 feet bgs as well.

Optional borings will be advanced when initial borings do not fully characterize the extent of impacts.

#### 1.3.1.2 Soil Gas Sampling

In the case of soil gas, the locations of the probes will be determined in the field, based on impacts identified during soil and/or groundwater monitoring well installation. Optional soil gas probes will be installed if soil impacts are identified while advancing initial soil gas probes. The depth of probes will be

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to near the surface of the water table. Depending on the depth to the water table, two probes and two soil

samples will be collected; one near the water table and another half way up to grade. If probes are

installed in buildings, a sub slab sample will also be collected.

If no impacts to soil or groundwater are identified in the field, soil and/or groundwater samples must be

analyzed prior to locating or installing any soil gas probes. This case would involve a separate sampling

event.

1.3.1.3 Groundwater

Groundwater monitoring wells are proposed to be installed in various locations. If groundwater is not

encountered during soil boring advancement in a specific location, an off set will be attempted. If no

water is present, some well locations may be cancelled.

Contingent well locations will be installed either to replace poor yield locations or to further define

impacts. Perched water may be encountered and insufficient water may be present in this area of

Chicago.

1.3.1.4 Surface Water

Surface water sampling will be conducted in accordance with Section 6.6 of the SSWP.

1.3.1.5 Sediment

Sediment sampling and the dynamic process are described in Section 6.6 of the SSWP.

1.3.2 Project Personnel

Figure 2 of this Site-Specific FSP presents technical team strategy and the key project staff responsible

for project planning, data and decision quality and final work products, consistent with the Multi-Site

Quality Assurance Project Plan (QAPP), Rev 2, dated September 4, 2007 (Integrys 2007) and as modified

in the Site-Specific QAPP. The Site-Specific QAPP is contained in an appendix to the SSWP.

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# 1.3.3 Subcontractors

A list of subcontracted services will be provided to USEPA for review prior to initiating field work, in accordance with the AOC/SOW.

# 1.3.4 Communication Strategy

Section 5.3 of the SSWP provides the site-specific communication strategy, and identifies project communication flow, frequency and documentation requirements between potentially responsible parties/responsible parties, regulators, project managers, field personnel, contractors and others.

# 1.3.5 Decision-Making Processes

The decision-making process for field activities is provided in Section 6 and Tables 2 and 3 of the SSWP, in Section 1.3.1 of this Site-Specific FSP.

# 1.3.6 Data Exchange

Section 6 and Tables 2 and 3 of the SSWP describes the data required to make field decisions. Analytical data reports will be provided to USEPA in an electronic format in accordance with the Multi-Site QAPP (Integrys 2007c). Data will be provided in the form of a monthly progress report submitted on the 15<sup>th</sup> day of each month, provided it has been validated. Data may also be provided in figures and tables for submittal with the progress report. The usability of previously collected data will be evaluated according to criteria specified in the Site-Specific QAPP. The Site-Specific Conceptual Site Model (CSM) will be refined as investigation data is generated and used to facilitate the RI. The RI Report will be submitted in accordance with the Project Schedule presented in Figure 12 of the SSWP and discussed in Section 9 of the SSWP.

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# **2 SAMPLE LOCATIONS**

# 3 FIELD MOBILIZATION AND SITE ACCESS

See Multi-Site FSP, Rev 4, September 8, 2008.

# 3.1 Site Access

See Multi-Site FSP, Rev 4, September 8, 2008.

# 3.2 Mobilization Activities

See Multi-Site FSP, Rev 4, September 8, 2008.

# 3.3 Site Safety

See Multi-Site FSP, Rev 4, September 8, 2008.

# 3.4 Demobilization Activities

# **4 DATA COLLECTION PROCEDURES**

# 4.1 Field Standard Operating Procedures

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.2 Soil Sampling

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.2.1 Data Uses

Soil data will be collected from various depth intervals. Results from samples collected from the ground surface to 10 feet below ground surface (bgs) may be used to support the human health dermal and inhalation exposure routes, depending on the location of sampling. Deeper subsurface soil samples may be collected to evaluate the vertical extent of MGP residuals, to support a random sampling scheme if no impacts are observed or to evaluate remedial alternatives, if required.

# 4.2.2 Surface Soil Samples

Surface soil samples will be collected from 0 to 2 feet bgs on the ComEd and Marcey Parcels. Surface soil was previously removed on the General Iron, Finkl, Peoples Gas and Marcey West Parcels.

# 4.2.3 Subsurface Soil Samples

Subsurface soil is defined as soil at depths greater than 2 feet bgs. Samples will be collected as described in Sections 4 and 6 and Table 2 and 3 of the SSWP. A guidance document for describing coal tar contamination in soil is included in Appendix D of the SSWP.

# 4.2.4 Test Pits

No test pits are planned as part of the SSWP.

# 4.2.5 Soil Borings

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.2.6 Subsurface Probes

No subsurface probes are planned as part of the SSWP.

# 4.2.6.1 Conductivity Probe

No conductivity probes are planned as part of the SSWP.

#### 4.2.6.2 Cone Penetrometer

No cone penetrometer probes are planned as part of the SSWP.

#### 4.2.6.3 Laser Induced Fluorescence

No laser induced fluorescence (LIF) probes are planned as part of the SSWP.

#### 4.2.6.4 In-Situ Camera

No in-situ camera probes are planned as part of the SSWP.

#### 4.2.6.5 Membrane Interface Probe

No membrane interface probes (MIPs) are planned as part of the SSWP.

# 4.2.7 Borehole Abandonment

Boreholes will be abandoned in accordance with 77 Illinois Administrative Code (IAC) Part 920.120.

# 4.3 Geophysical Methods

#### 4.3.1 Overview

Geophysical data will be collected as part of the SSWP for sediment samples.

# 4.3.2 Upland Applications

No Upland geophysical data will be collected as part of the SSWP.

# 4.3.3 Sediment Applications

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.3.4 Base Mapping and Survey Control

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4 Groundwater Sampling

#### 4.4.1 Overview

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.2 Data Uses

Groundwater data will be collected to support the evaluation of human health dermal and ingestion exposure routes. Groundwater data will also be collected to evaluate groundwater quality at the surface water interface and to evaluate related vapor intrusion potential, if impacts are present.

# 4.4.3 Water Level Elevation Readings

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.4 Groundwater Grab Samples

No groundwater grab samples are planned as part of the SSWP.

# 4.4.4.1 HydroPunch® Small Diameter Telescoping Screen

No groundwater grab samples are planned as part of the SSWP.

# 4.4.4.2 Geoprobe® Groundwater Sampling Systems

No groundwater grab samples are planned as part of the SSWP.

#### 4.4.4.3 Screen Point 15/Groundwater Sampling System

No groundwater grab samples are planned as part of the SSWP.

#### 4.4.4.4 Groundwater Profiler

No groundwater grab samples are planned as part of the SSWP.

#### 4.4.4.5 Membrane Interface Probe (MIP)

No groundwater grab samples are planned as part of the SSWP.

# 4.4.4.6 Drive-Point Profiler®

No groundwater grab samples are planned as part of the SSWP.

# 4.4.4.7 BAT® GMS Sampling

No groundwater grab samples are planned as part of the SSWP.

# 4.4.5 Monitoring Wells

#### 4.4.5.1 Well Placement

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.5.2 Well Screen Placement

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.5.3 Temporary Monitoring Wells

No temporary monitoring wells are planned as part of the SSWP.

# 4.4.5.4 Small-Diameter Prepacked Monitoring Wells

No prepacked monitoring wells are planned as part of the SSWP.

# 4.4.5.5 Large-Diameter Monitoring Wells

#### 4.4.5.5.1 Well Borehole

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.5.5.2 Large-Diameter Monitoring Well Construction

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.6 Monitoring Well Development

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.7 Monitoring Well Groundwater Sampling

# 4.4.7.1 Purging

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.7.2 Sample Collection

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.7.2.1 Bailer Sampling

Bailer sampling is not planned as part of the SSWP.

#### 4.4.7.2.2 Low-Flow Sampling

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.7.2.3 Diffusion Sampling

Diffusion sampling is not planned as part of the SSWP.

#### 4.4.8 Potable Wells

No potable well samples are planned as part of the SSWP.

# 4.4.9 Aquifer Characterization

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.9.1 Single Well Tests

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.9.2 Pneumatic Slug Test Kit

#### 4.4.9.3 Multiple Well Tests

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.4.9.4 Controlled Pumping Tests

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.4.10 Monitoring Well Abandonment

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.5 Groundwater / Surface Water Dynamic Evaluation

No groundwater/surface water (gw/sw) dynamic evaluations are planned as part of the SSWP.

# 4.5.1 Direct Pore Water Sampling

No groundwater/surface water dynamic evaluations are planned as part of the SSWP.

# 4.5.2 Indirect Pore Water Samplers

No groundwater/surface water dynamic evaluations are planned as part of the SSWP.

# 4.5.3 Pore Water Sampling Summary

No groundwater/surface water dynamic evaluations are planned as part of the SSWP.

# 4.6 Surface Water Monitoring

# 4.6.1 Surface Water Sampling

# 4.6.1.1 Ecological Risk Assessment Samples

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.6.1.2 Human Health Risk Assessment Samples

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.6.2 River Hydrology

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7 Sediment Sampling

#### 4.7.1 Overview

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.2 Sediment Sampling Locations

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.7.3 Sediment Data Uses

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.3.1 Screening Level Ecological Risk Assessment (SLERA) and Baseline Ecological Risk Assessment (BERA)

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.3.2 Bioavailability Samples

# 4.7.3.3 Benthic Community Investigation

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.3.4 Sediment Toxicity Testing

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.7.3.5 Human Health Risk Assessment

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.4 Delineation Sediment Sampling

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.5 Sediment Stability and Contaminant Fate and Transport

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.6 Geotechnical and Waste Characterization Sampling

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.7.7 Sediment Collection Devices and Methods

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.7.1 Surficial Sediment Collection and Processing

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 4.7.7.2 Coring Devices

# 4.7.7.3 Hand or Push Core Sampling and Processing

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.7.4 Vibracore Sampling and Processing

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.7.5 Support Sediment Sampling Equipment

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.8 In-Situ Field Screening Methods

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.7.8.1 Laser Induced Fluoresence (LIF) Screening Methods

LIF screening is not planned as part of the SSWP.

#### 4.7.8.2 DART Method

DART screening is not planned as part of the SSWP.

# 4.7.9 Sediment Poling

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.8 Soil Vapor Assessment

#### 4.8.1 Overview

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# 4.8.2 Data Uses

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.8.3 Soil Vapor Methodology and Analysis

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.9 Field Documentation

# 4.9.1.1 Field Data Recording

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.9.1.2 Data Tracking, Storage, and Retrieval

See Multi-Site FSP, Rev 4, September 8, 2008.

# 4.9.1.3 Final Evidence Files

# **5 SAMPLE HANDLING**

See Multi-Site FSP, Rev 4, September 8, 2008.

# 5.1.1 Sample Identification

Soil samples will be identified as follows:

WHS-SB117-001 WHS – Peoples Willow/Hawthorne SB117 – Soil boring 117 001 – Primary soil sample from this soil boring See Multi-Site FSP, Rev 4, September 8, 2008.

Groundwater samples will be identified as follows:

WHS-MW101-001
WHS – Peoples Willow/Hawthorne
MW101 – Monitoring well 101
001 – Primary groundwater sample from this monitoring well

Soil gas samples will be identified as follows:

WHS-SG001-4'-001 WHS – Peoples Willow/Hawthorne SG001 – Soil gas location 001 4' – depth of gas vapor probe at 4' 001 – Primary groundwater sample from this monitoring well

Waste characterization samples will be identified as follows:

WHS-SWC01 WHS – Peoples Willow/Hawthorne SWC01 – Soil waste characterization; first sample

Duplicate samples will be identified as follows:

Example: WHS-SB117-101 101 – Duplicate sample

WHS-RB01

WHS – Peoples Willow/Hawthorne RB01 – Rinsate blank; first sample

Trip blank samples will be identified as follows:

WHS-TB01

WHS - Peoples Willow/Hawthorne

TB01 – Trip blank; first sample

For additional information see the Multi-Site FSP, Rev 4, September 8, 2008.

# 5.1.2 Sample Container, Volume, Preservation and Holding Times

See Multi-Site FSP, Rev 4, September 8, 2008.

# 5.1.3 Field Sampling Quality Control

See Multi-Site FSP, Rev 4, September 8, 2008.

# 5.1.4 Sample Custody

See Multi-Site FSP, Rev 4, September 8, 2008.

# 5.1.5 Sample Shipping

# **6 SAMPLE ANALYSIS**

# 6.1.1 Previous Sampling and Analysis

See Multi-Site FSP, Rev 4, September 8, 2008.

# 6.1.2 Chemical Analysis

See Multi-Site FSP, Rev 4, September 8, 2008.

# 6.1.3 Field Based Analytical Method Selection Criteria

See Multi-Site FSP, Rev 4, September 8, 2008.

# 6.1.4 Geotechnical Testing

# 7 FIELD SURVEYING

# 7.1.1 Overview

See Multi-Site FSP, Rev 4, September 8, 2008.

# 7.1.2 Horizontal and Vertical Control

See Multi-Site FSP, Rev 4, September 8, 2008.

# 7.1.3 Data Acquisition

See Multi-Site FSP, Rev 4, September 8, 2008.

# 7.1.4 Previously Obtained Survey Data

# **8 DECONTAMINATION**

# 8.1 Overview

See Multi-Site FSP, Rev 4, September 8, 2008.

# 8.2 Decontamination of Personnel

See Multi-Site FSP, Rev 4, September 8, 2008.

# 8.3 Decontamination of Equipment

See Multi-Site FSP, Rev 4, September 8, 2008.

# 8.3.1 Sampling Equipment

See Multi-Site FSP, Rev 4, September 8, 2008.

#### 8.3.2 Tools

See Multi-Site FSP, Rev 4, September 8, 2008.

# 8.3.3 Heavy Equipment and Vehicles

See Multi-Site FSP, Rev 4, September 8, 2008.

# 8.3.4 Cleaning and Decontamination of Equipment/Sample Containers

# 8.3.4.1 Equipment Decontamination

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# 8.3.4.2 Sample Container Decontamination

# 9 MANAGEMENT OF INVESTIGATION DERIVED WASTES

See Multi-Site FSP, Rev 4, September 8, 2008.

# 9.1 Investigation Waste Sources

See Multi-Site FSP, Rev 4, September 8, 2008.

# 9.2 Soil

See Multi-Site FSP, Rev 4, September 8, 2008.

# 9.3 Well Development and Purge Water

See Multi-Site FSP, Rev 4, September 8, 2008.

# 9.4 Decontamination Wastes

See Multi-Site FSP, Rev 4, September 8, 2008.

# 9.5 Personal Protective Equipment

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# Appendix C-3 Figure 2 Technical Team Strategy

